

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
COMMERCE, *et al.*,

Defendants.

No. 1:18-cv-2921 (JMF)

NEW YORK IMMIGRATION
COALITION, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
COMMERCE, *et al.*,

Defendants.

No. 1:18-cv-5025 (JMF)

JOINT MOTION FOR ENTRY OF FED. R. EVID. 502(D) ORDER

The parties respectfully move the Court, pursuant to Federal Rule of Evidence 502(d), to enter the attached order governing the inadvertent production of documents that may be privileged or protected. In support of this motion, the parties state as follows:

1. The parties have exchanged discovery requests that seek documents or other information that may be privileged or protected from disclosure.

2. To guard against the risk of inadvertent waiver of any applicable privileges or protections, the parties have conferred and agreed on a procedure to assert such claims after production pursuant to Federal Rule of Evidence 502(d).
3. Accordingly, the parties respectfully request that the Court enter the attached proposed order.

Dated: September 4, 2018

Respectfully submitted,

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** Not admitted in the District of Columbia; practice limited pursuant to D.C. App. R. 49(c)(3).